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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

OMINA KHADIJAH RITSON,

Defendant.

CASE NO. 2:24-CR-00058-AC

STIPULATION AND ~~PROPOSED~~ ORDER TO
CONTINUE TRIAL AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT; PROPOSED
FINDINGS AND ORDER

DATE: July 28, 2025
TIME: 9:00 a.m.
COURT: Hon. Alison Claire

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a trial on July 28, 2025. ECF No. 18.
2. By this stipulation, the parties now jointly move to continue the trial to a date between September 15, 2025, and October 31, 2025, and to exclude time between July 28, 2025, and the rescheduled trial date, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) New counsel for the government, Zulkar Khan, was designated on May 2, 2025, and former counsel for the government, Heiko Coppola, was terminated from the case. Prior to his designation, Mr. Khan registered to sit for the California Bar Exam's Attorneys' Exam. The Attorneys'

Exam is scheduled for July 29, 2025, and would conflict with a three-day trial starting on July 28, 2025.

b) A one-count information was filed in this case on March 12, 2024. A superseding information, adding three additional counts of violating federal law, was filed on March 3, 2025.

Counsel for the defendant desires additional time to review the recently filed charges and to discuss potential resolutions with his client.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of July 28, 2025 to the rescheduled trial date, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] (reasonable time to prepare) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

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1 IT IS SO STIPULATED.

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3 Dated: May 23, 2025

MICHELE BECKWITH
Acting United States Attorney

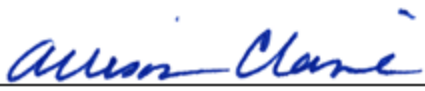
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5 /s/ ZULKAR KHAN
6 ZULKAR KHAN
Assistant United States Attorney

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8 Dated: May 23, 2025

/s/ MICHAEL HEUMANN
MICHAEL HEUMANN
Counsel for Defendant
OMINA KHADIJAH RITSON

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15 **[PROPOSED] FINDINGS AND ORDER**

16 IT IS SO FOUND AND ORDERED this 23rd day of May, 2025.

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18 ALLISON CLAIRE
19 UNITED STATES MAGISTRATE JUDGE